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11 Attorneys for Defendant-Counterclaimant
12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

**DECLARATION OF MARK PATRICK
IN SUPPORT OF MEDIATEK INC.'S
STIPULATED ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL, DOCKET NO. 299**

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2 I, Mark Patrick, declare as follows:

3 1. I am Law Director, Intellectual Property for Freescale Semiconductor, Inc.
4 (Freescale). I submit this declaration in support of MediaTek's Stipulated Administrative Motion
5 to File Documents Under Seal (Motion to Seal), Dkt. No. 299, pursuant to Local Rules 7-11 and
6 79-5. I have personal knowledge of the facts set forth in this declaration and, if called to testify as
7 a witness, could and would do so competently.

8 2. **Technical Information Concerning Function and Operation of Freescale**
9 **Products.** MediaTek seeks to file under seal Exhibits 5A, 5B, and 5C to the Declaration of
10 Jennifer E. Chen in Support of MediaTek's Motion to Strike, or in the Alternative Preclude Under
11 Daubert, Improper Opinions of Dr. Frank Vahid (Chen Declaration Exs. 5A, 5B, and 5C), which,
12 when combined, is the Rebuttal Expert Report of Dr. Frank Vahid. (Dkt. Nos. 299-12, 299-13,
13 299-14.) Attached as Exhibits 1, 2, and 3 to this declaration are the versions of Chen Declaration
14 Exs. 5A, 5B, and 5C with Freescale's proposed redactions. The identified portions of Chen
15 Declaration Exs. 5A, 5B, and 5C discuss highly confidential proprietary information on the
16 technical details of Freescale's accused products derived from confidential detailed block
17 diagrams, which identify the arrangement of specific blocks on Freescale's accused products.
18 Freescale stamped documents containing these confidential detailed block diagrams "Highly
19 Confidential – Attorneys' Eyes Only" before producing them to MediaTek. Disclosure of
20 information from these confidential detailed block diagrams would significantly harm Freescale
21 by allowing its competitors to learn detailed information on the function and operation of the
22 accused product families, including the arrangement and behavior of specific blocks, such that
23 they may appropriate Freescale's proprietary technology. The requested relief is necessary and
24 narrowly tailored to protect the confidentiality of this information. Accordingly, Freescale
25 requests that the Court seal the portions of Chen Declaration Exs. 5A, 5B, and 5C that Freescale
26 has proposed be redacted in Exhibits 1, 2, and 3 to this declaration.
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2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed this 12th day of November, 2013, at Austin, Texas.

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5 Mark Patrick
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